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BEFORE THE POSTAL RATE COMMISSION WASHINGTON, D.C. 20268–0001

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POSTAL RATE COREJOSION OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

RESPONSE OF UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF THE OFFICE OF THE CONSUMER ADVOCATE
(OCA/USPS-T9-27 REDIRECTED FROM WITNESS TAYMAN AND OCA/USPS-81)
AND REQUEST FOR ADDITIONAL TIME TO RESPOND TO
OCA MOTION TO COMPEL OF MARCH 23, 2000, IF NECESSARY

The United States Postal Service hereby provides its response to the following interrogatories of the Office of the Consumer Advocate OCA/USPS-T9-27, filed on February 23, 2000, and redirected from witness Tayman; and OCA/USPS-81, filed on March 6, 2000. These interrogatories were the subject of a motion to compel filed by the OCA on March 23, 2000.

The Postal Service and the OCA have been negotiating regarding these responses. Although these negotiations are ongoing, the Postal Service did not want to unnecessarily delay provision of the responsive material that it is willing to provide at this time. In the event that further negotiations are not successful, and the OCA continues to seek information that the Postal Service is not willing to provide, the Postal Service requests an additional day after the conclusion of unsuccessful negotiations to respond to any outstanding parts of the OCA's motion to compel.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr. Chief Counsel, Ratemaking

475 L'Enfant Plaza West, S.W. Washington, D.C. 20260–1137 (202) 268–2999; Fax –5402 March 31, 2000

Scott L. Reiter

RESPONSE OF UNITED STATES POSTAL SERVICE TO INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE REDIRECTED FROM WITNESS TAYMAN

OCA/USPS-T9-27.

The following refers to the USPS FY 2000 Operating Plan.

(a) Please provide the most current USPS FY 2000 Operating Plan by accounting periods for Postal Service operating revenues, appropriations, investment income, expenses and volumes.

(b) For each of the thirteen accounting periods presented in part "a" of this interrogatory, please provide the most current USPS FY 2000 Operating Plan with operating revenues broken out by mail class and subclass cost categories.

RESPONSE:

- (a) Please see attached.
- (b) Please see response of United States Postal Service to OCA/UPSP-81.

U.S. POSTAL SERVICE FY 2000 OPERATING PLAN (\$THOUSANDS)

	AP 01	AP 82	AP 03	AP 64	AP 05	AP 06	AP 07	AP 68	AP 09	AP 10	AP 11	AP 12	AP 13	TOTAL
OPERATING REVENUE APPROPRIATIONS INVESTMENT INCOME TOTAL REVENUE	5,138,291 5,904 2,840 5,138,135	5,243,965 5,004 2,830 5,250,839	5,142,346 5,004 2,030 5,149,380	5,170,133 5,004 2,030 5,177,167	5,161,247 5,004 2,030 5,168,281	4,993,792 5,004 2,030 5,000,826	5,100,643 5,004 2,030 5,167,677	5,194,985 5,004 2,030 5,111,999	4,947,212 5,804 2,030 4,954,246	4,626,736 5,664 2,030 4,633,770	4,616,514 5,004 2,030 4,623,548	4,729,602 5,604 2,030 4,727,636	4,871,302 5,009 2,060 4,878,371	64,899,698 65,057 27,230 64,981,975
TOTAL EXPENSES NET INCOME (LOSS)	4,789,897	4,895,628	4,896,929	5,124,244 52,923	4,996,468	4,958,393 42,433	\$,077,083 90,584	5,033,264	5,029,886	4,851,244	4,861,054	5,008,615	5,226,386	64,739,801 242,874
CONVERSION TO GFY NET INCOME (LOSS)														(142,574) 100,000
TOTAL MAIL VOLUME CONVERSION TO GFY NET INCOME (LOSS)	16,666,575	17,463,311	16,398,371	15,757,830	16,586,429	16,109,254	16,819,429	16,133,557	15, 666,94 2	14,765,490	14,579,066	15,184,649	15,924,248	1,582,238 209,368,387

RESPONSE OF UNITED STATES POSTAL SERVICE TO INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE

OCA/USPS-81. Provide the Postal Service's FY 2000 budget plan in full detail (i.e., by Accounting Period and mail class and subclass).

RESPONSE:

Please see attached.

US POSTAL SERVICE FY 2000 REVENUE & VOLUME PLANS MILLIONS

[MAIL VOLUME	REVENUE
FIRST	105,010	36,031
PRIORITY	1,251	4,815
EXPRESS	70	990
PERIODICALS	10,419	2,199
STANDARD A	90,097	15,415
PARCEL POST	359	1,101
INTERNATIONAL	980	1,587
OTHER	1,182	3,286
TOTALS	209,368	65,424

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

Scott L. Reiter

475 L'Enfant Plaza West, S.W. Washington, D.C. 20260–1137 March 31, 2000